IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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| § Civil Action No.: 3:22-cv-1650 |
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| § JURY DEMAND |
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Plaintiff, RENICE TAYLOR (hereafter referred to as "Plaintiff"), by and through her undersigned counsel, JOHNSON BECKER, PLLC and CLARK VON PLONSKI ANDERSON hereby submits the following Complaint and Demand for Jury Trial against Defendant SUNBEAM PRODUCTS, INC. (hereafter referred to as "Defendant Sunbeam"), and alleges the following upon personal knowledge and belief, and investigation of counsel:

NATURE OF THE CASE

- 1. Defendant Sunbeam designs, manufactures, markets, imports, distributes and sells a wide-range of consumer products, including the subject "Crock-Pot Express Crock Multicooker," which specifically includes the Model Number SCCPPC 600-V1 (referred to hereafter as "Pressure Cooker(s)").
- 2. Defendant Sunbeam touts that its Pressure Cookers are designed with "safety in mind," which include supposed "safety measures" such as "safety sensors" that purport to keep the lid from being opened while the unit is under pressure.

¹ See Sunbeam Products, Inc. Crock-Pot Express Crock Multicooker Owner's Manual, pg. 10, attached hereto as Exhibit A

 $^{^{2}}$ Id.

³ *Id*.